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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8
9 In the Matter of the Arbitration Between

10 JAMES HOWDEN & COMPANY LTD,

11 Petitioner,

12 v.

13 BOSSART LLC,

14 Respondent.
15

NO. 15-CV-01977 JLR

MOTION FOR ORDER CONFIRMING
FOREIGN ARBITRATION AWARD

Noted for consideration:
Friday, January 29, 2105

16 Comes now Petitioner James Howden & Company LTD (“Howden”), by and through
17 its attorneys undersigned, and hereby moves for entry of an order granting its Petition to
18 Confirm Foreign Arbitration Award (“Petition”) and confirming the Foreign Arbitration
19 Award issued by the International Court of Arbitration of the International Chamber of
20 Commerce on July 6, 2015 (the “Award”) referenced therein.
21

22 On December 16, 2015, Howden filed its Petition (ECF 1), which seeks
23 confirmation of the Award pursuant to Section 207 of the Federal Arbitration Act (9 U.S.C.
24 § 207) and legislation implementing the Convention on the Recognition and Enforcement
25 of Foreign Arbitral Awards of June 10, 1958 (9 U.S.C. § 201 *et seq*). The Petition is
26 supported by a Memorandum of Law (ECF 2) and the Declaration of Michael E. Ricketts

**MOTION FOR ORDER CONFIRMING
FOREIGN ARBITRATION AWARD - 1 of 3**
(Case No. 15-01977 JLR)
[4822-9780-9708]

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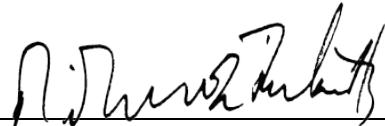
1 with accompanying exhibits (ECF 3). Respondent Bossart LLC was served with the
2 Petition and supporting materials on December 19, 2015 (ECF 6 and 7).

3 As discussed in the supporting memorandum, confirmation of an arbitration award
4 is a summary proceeding that converts a final arbitration award into a judgment of the
5 Court. Confirmation should be granted unless the award is vacated, modified or
6 corrected. Howden now brings the Petition before the Court for consideration via this
7 motion pursuant to 9 U.S.C. § 6, which states that such an application “shall be made
8 and heard in the manner provided by law for the making and hearing of motions . . .”
9

10 Wherefore, Petitioner James Howden & Company LTD respectfully requests that
11 this Court grant its Petition to Confirm Foreign Arbitration Award and confirm the Award.
12 A proposed form of order is attached.

13 Dated this 7th day of January, 2016.

14 GORDON THOMAS HONEYWELL LLP

15
16 By: 

17 Michael E. Ricketts, WSBA No. 9387

18 mricketts@gth-law.com

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22 Tel: (206) 676-7500

23 *Attorneys for James Howden & Co. LTD*

1 **CERTIFICATE OF SERVICE**

2 I, Sharon K. Hendricks, certify that on the date below, I caused to be served a true
3 and correct copy of the foregoing **Motion for Order Confirming Foreign Arbitration Award**,
4 on all parties in this action listed below, via U.S. Mail:
5

6 Bossart LLC
7 c/o Newell Bossart
8 3311 78th Pl. NE, Ste. 1200
Medina, WA 98039

Bossart LLC
c/o Russell Bossart
3311 78th Pl. NE, Ste. 1200
Medina, WA 98039

9 I declare under penalty of perjury under the laws of the State of Washington that
10 the foregoing is true and correct.

11 DATED at Seattle, Washington, this 7th day of January, 2016.

12
13 /s/ Sharon K. Hendricks
14 Sharon K. Hendricks, Legal Assistant
GORDON THOMAS HONEYWELL LLP
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